

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA

In re:

Pro-Mark Services, Inc.,

Bky. Case No. 24-30167
Chapter 7

Debtor.

Erik A. Ahlgren, as Chapter 7 Trustee
of the Bankruptcy Estate of Pro-Mark Services, Inc.,
as Administrator of the Pro-Mark
Services, Inc. Employee Stock Ownership Plan, and
as Trustee of the Pro-Mark Services, Inc.
Employee Stock Ownership Trust,

Plaintiff,

v.

Adversary No. 24-07014

Connie Berg, Kyle Berg, Connie Berg Revocable
Living Trust, Kyle R. Berg Revocable Living Trust,
Chad DuBois, Mandy Grant, and Miguel Paredes,

Defendants.

**STIPULATED MOTION TO EXTEND DEFENDANT MIGUEL PAREDES' TIME TO
REPLY TO PLAINTIFF'S RESPONSE TO DEFENDANT MIGUEL PAREDES'
MOTION TO DISMISS**

1. On October 25, 2024, Defendant Miguel Paredes ("Paredes") filed his Motion to Dismiss the Amended Complaint. [Doc. 30] Plaintiff's response deadline for the Motion to Dismiss was extended to November 22, 2024 pursuant to a Stipulated Motion to Extend Plaintiff's Time to Respond to Defendant Miguel Paredes' Motion to Dismiss [Doc. 39], and the Court's Order granting said Stipulation. [Doc. 40].

2. Plaintiff and Defendant Paredes hereby move the Court, by stipulation, for an order extending the deadline for Defendant Paredes to reply to Plaintiff's response to Defendant Paredes' Motion to Dismiss to December 10, 2024.

Dated: November 21, 2024

/s/ Peter D. Kieselbach

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Dated: November 21, 2024

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